

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

**SUPPLEMENTAL DECLARATION**

I, Jason T. Maynard, declare under penalty of perjury:

1. I am a Partner in the law firm of Peter D. Maynard, Counsel & Attorneys, located at Corner of Bay & Deveau Streets, P.O. Box N-1000, Nassau, The Bahamas (the “Firm”).

2. On February 7, 2023, I submitted a *Declaration* [D.I. 640] (the “Original Declaration”)<sup>2</sup> in support of the Firm’s retention as an Ordinary Course Professional pursuant to the *Order Authorizing Procedures to Retain, Compensate and Reimburse Professionals Utilized in the Ordinary Course of Business* (the “OCP Order”). I submit this Supplemental Declaration in further support of the Firm’s retention as an Ordinary Course Professional pursuant to the OCP Order.

3. Following the submission of the Original Declaration, it was brought to my attention that paragraph 4 of the Original Declaration was not accurate. I hereby amend

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<sup>1</sup> The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

<sup>2</sup> Capitalized terms not otherwise defined herein are to be given the meanings ascribed to them in the Original Declaration.

paragraph 4 of the Original Declaration to read:

4. The Firm HAS provided services to the Debtors prior to the Petition Date. In December 2021, Mr. Can Sun, the former general counsel of FTX Trading Ltd., contacted the Firm to seek advice on drafting an arbitration clause for the purpose of settling disputes to be included in the contracts or terms of service between FTX Trading Ltd. and other entities. The Firm presented the draft the arbitration clause on January 11, 2022. On January 13, 2022, the Firm issued an invoice, attached hereto as Exhibit A, for the work on the arbitration clause. On July 29, 2022, the Firm sent a letter, attached hereto as Exhibit B, to FTX Trading Ltd. indicating, among other things that the file on the matter was closed. On September 23rd, 2022, the Firm sent a follow up e-mail to Mr. Sun inquiring whether FTX Trading Ltd. needed legal assistance on any other matters; and, on the same date, Mr. Sun replied indicating that he would keep the Firm in mind. A copy of this correspondence is attached hereto as Exhibit C. There was no further communication between the Firm and FTX Trading Ltd. prior to the Petition Date.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: March 7, 2023

  
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Jason T. Maynard